

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
)
V.) Criminal No. 15-36E
)
ELIZABETH MCMAHAN)

UNOPPOSED MOTION TO TRAVEL

AND NOW, comes the defendant, Elizabeth McMahan, by her attorney, and with respect to the above captioned matter, she represents the following:

1. Christian Trabold consents to the relief sought herein.
2. Ms. McMahan is released on an unsecured bond and her travel is restricted to the Western District of Pennsylvania, New York and Ohio.
3. She hereby seeks permission to travel to Richmond, Virginia by airplane on December 17, 2019 and returning to the Western District of Pennsylvania by automobile on December 18, 2019; and travel to Richmond, Virginia by automobile on December 29, 2019 and returning to the Western District of Pennsylvania by airplane on December 30, 2019. The travel purpose is to pick up her daughter from college, and take her daughter back to college for the holiday break.

WHEREFORE, the defendant, Elizabeth McMahan requests permission to travel as specified within the proposed Order of Court.

Respectfully submitted,

s/ Thomas Livingston
Thomas Livingston
Assistant Federal Public Defender
Attorney ID No. 36949